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Chula Vista, California 91913

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OFFICE OF THE  
COUNCIL

March 5, 2013

Federal Election Commission  
999 "E" Street, NW  
Washington, D.C. 20463  
FAX: (202) 219-3923

**Re: MUR # 6719**

Dear Sirs:

I am writing this letter in response to the blatantly false FEC Complaint (MUR #6719) that has been filed with your Honorable Commission by one Karin Tausan of San Diego, California 92116.

Please let me begin by informing your Honorable Commission that this individual, Karin Tausan, is well-known throughout the San Diego community, where we both reside, as an unstable individual and Unfortunately, Karin Tausan's has led to a progression of extreme and irrational behavior towards others in the community. Karin Tausan has most recently lodged a campaign against me, my family and my father's former University, Aristotle University, both publicly and privately.

Karin Tausan's current is best evidenced in her FEC Complaint MUR #6719, wherein she irrationally interprets the cease and desist letter that she received from our attorney, Mr. Leon E. Campbell of La Jolla California. In that request for a cease and desist, she is quite simply asked to refrain from the continued unabated intentional stalking and harassment of myself and my family. In her FEC Complaint MUR #6719, you will see that at the top of the first page of the letter from our attorney, she draws a rather disturbing and completely irrational conclusion, characterizing the intent of Mr. Campbell's letter to be one of "intimidation" against her. This from reality is even further illustrated in her subsequent irrational thought processes, wherein she infers that the letter was intended specifically to enuse her to refrain from "contacting your offices." That alone, your Honorable Commission, should be sufficient to completely discredit any FEC Complaint brought forth by this individual, altogether.

Karin Tausan, a vexatious litigant, has sued my father, myself and all four of my father's former business entities in the Superior Court of California, County of San Diego, twice, to this date. One case was resolved in our favor and the second is pending a hearing so he set by the Court. Karin Tausan has misrepresented the facts in her FEC Complaint MUR #6719, as submitted to your Honorable Commission, wherein she submits a Notice of Entry of Judgment which is no longer in effect as the matter is currently before the Court and awaiting a hearing date. She submits what appears to be a Court transcript that may or may not be the actual transcript from the first civil case brought by her, which my family won. That transcript is not authenticated and does not appear to be complete. Karin Tausan lost her case in Superior Court of California, County of San Diego, against myself, my father and three of his former business entities. In that case, Karin Tausan falsely claimed to be an employee who was owed wages by Aristotle University. She had made the same claim against another local University a couple of years ago. That particular University also had no record of Karin Tausan being an employee of theirs. It is my very strong belief that Karin Tausan is in pursuit of what she deems as "deep pockets" and does not concern herself with any truth. She would often boast to me that subsequent to the adjudication of the matter against the other University, she had provided a great deal of chaos to them with nasty e-mails, contacting of their students, harassing of their administration and faculty, etc..

Karin Tausan, upon losing her case against myself and my family and unbeknownst to us, then re-filed on the already adjudicated matter with a different claim for return of tuition monies from Aristotle University. She by her own admission did not serve me and did not serve my father with notice of the lawsuit. When the case went to Court, I was dropped from that matter altogether, as the judge determined that her claim for the return of any tuition monies would come from Aristotle University itself, the entity previously owned by my father, now under new ownership. Karin Tausan had been denied admission to Aristotle University due to her failure to complete the paperwork required for admission. However, when my father received notice of the judgment having been entered by the Court in the second case, after the fact, and since there had been no appearance in Court on our behalf, we requested the judgment be vacated and a new hearing on the matter be scheduled. That matter is still pending with the Court and we are awaiting a hearing date. Karin Tausan does not have a valid Entry of Judgment against Aristotle University at this time as she is attempting to falsely portray to your Honorable Commission.

The claim, which is currently pending in the Superior Court of California, County of San Diego is the exact claim that Karin Tausan now brings in the form of an FEC Complaint before your Honorable Commission. She falsely claims to have made a political campaign loan last year in my race for U.S. Congress in California's 51<sup>st</sup> District. Yet, the question arises as to why she did not file an FEC Complaint to begin with, if it was, in fact, a campaign loan or contribution, as she now alleges or if she really knew of any campaign wrongdoing. Why did she first claim unearned wages, then tuition reimbursement and now a campaign loan or contribution?

It is imperative that your Honorable Commission understand that Karin Tausan is a very dangerous individual who has absolutely no concept of the truth. She has submitted fabricated e-mails both to the Superior Court of California, County of San Diego, as well, new e-mails, now appearing in the FEC Complaint MUR#6719 before your Honorable Commission. The e-mails that she has submitted in both instances are not mine and were not written by me. It is very

interesting to note that these alleged e-mail "communications" have a "Yahoo Mail" title and address below, when neither of the e-mail addresses allegedly involved in those "communications" have a yahoo e-mail address attached to them. I have begun a trace of the information that appears at the bottom of these pages through a private investigator. I have also retained counsel to file a several hundred thousand dollar civil lawsuit against Karin Tausan for damages resulting from her actions against myself, my family and Aristotle University.

Although I do not believe that your Honorable Commission will adjudicate the matter of FEC MUR #6719 as the matter is currently a civil matter pending before the Superior Court of California, County of San Diego and will additionally continue as part of a new case file in that Court. I do feel it necessary to set the record straight with the following statements of fact for your review:

What is important to point out very clearly here in response to FEC MUR# 6719 before your Honorable Commission is that there was not nor has there ever been a campaign contribution of any kind made by Aristotle University to any political campaign whatsoever. Aristotle University has never contributed to either of my political campaigns, past or present, nor to the campaign of any other political candidate in any election or election cycle.

My political campaigns, both past and present have never accepted political campaign contributions from any business or corporation.

There were never any tickets whatsoever sold on behalf of my political campaign to the U.S. Congress in California's 51<sup>st</sup> District in 2012 or in my current campaign.

There has never been any "substantial down payment" or any down payment whatsoever made by me or by anyone else on behalf of either of my political campaigns to the Grand Del Mar Hotel for any campaign sponsored event. In fact, I have never even attended or hosted any political or social event at the Grand Del Mar Hotel.

I have never borrowed money from anyone for the purposes of running either of my political campaigns.

I have NEVER received any "cash" contributions to my campaign, past or present. At the Brawley fundraiser in my 2012 campaign to the U.S. Congress, that was hosted by the Brawley farmers, I received 6 checks in amount of \$100 each and I have received 1 check in my current campaign in the amount of \$100 as a campaign contribution.

I have received from only one individual, in my past campaign and no individuals in this current campaign a contribution in the amount of \$100 which was made by credit card. There were no other credit card contributions to either of my campaigns. The contribution that was made by credit card in the amount of \$100, as is required by campaign finance law, was made through my campaign website and was automatically deposited into my campaign designated bank account, no other account.

My campaign, past or present, has not received any campaign contribution or loan, whatsoever, from one Karin Tausan.

Also, please note that Dr. Thomas A. Gionis, who is cc-ed in your correspondence is not and has not been President of Aristotle University for several years now.

The aforementioned facts as they have occurred are evidence that no action should be taken against Aristotle University, Inc. in this matter by your Honorable Commission as no wrongdoing whatsoever has occurred.

I thank you for your review of the facts in this matter.

Might I also respectfully request here that a firm and strong stance be taken by your Commission against Karin Tausan and others like her who find the time in their day to make false and very serious allegations against others, as a form of entertainment, and fail to realize the severity of their actions in bringing a false claim before your Federal Commission with the sole intent to harass.

I swear under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct.

Respectfully submitted,



Xanthi Gionis, J.D., L.L.M.

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